

Exhibit 94

PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION TO EXCLUDE GENERAL CAUSATION TESTIMONY OF PLAINTIFFS' EXPERTS

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

P2188.1

Instagram Test Account Protocols

Testing:

1. iPhone 11
2. Erase phone.
3. Create new iCloud account.
4. Install Instagram.
5. Create Instagram account, using icloud e-mail address, generated profile photo.

Teen girl account names:

Created	Account	Account age in 2023	Birth Date
Nov 27, 2023	ClaraAda10	13	Jan 01, 2010
Nov 28, 2023	ClaraAda13	13	Sept 01 2010
Nov 29, 2023	ClaraAda68	13	Sept 01, 2010
Nov 20, 2023	AdaClara32	13	Jan 01, 2010

In March 2025 I created the test account PatoPerezPa which was a test account of a 25 year old male, which then was used to test adding a parent to AdaClara32 to test the new teen accounts and parental controls.

AdaClara32 was the first test account created. I was testing a reels feature that allowed the creation by a 13 year old of a reel using sound provided by Instagram named: Sexy Young Girl Masturbating by Alexis Jayden. Set it up as a public account.

For ClaraAda10, ClaraAda13, and ClaraAda68:

Initial Instagram testing protocol was to create the account, all default settings, navigate to reels, and while navigating reels stop and watch videos that met a certain criteria. For example videos that were sexualized or violent. No private accounts were followed. All content in the videos was from accounts public at the time of recording.

Other aspects of testing: for the initial videos (November 2023 dates) ClaraAda accounts no searches were done and no accounts were followed. After initial testing and recording videos of reels behavior, few accounts were followed to see if that changed the nature of recommendations.

The videos were taken using screen recording on the iPhone, which has been in my possession all of the time and I am the only person that knows the passcode.



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P2188.2






























For the different videos, the date of file creation is the date the video was taken. Videos with November 2023 dates for the ClaraAda accounts were captured as described above. Videos with boy accounts (name Ivan) taken 18th of December were done to confirm behavior with a 14 year old male test account. I also created a 23 year old account to establish a baseline.

For self harm, the search string 'I want to hurt myself' I started testing using the ClaraAda accounts in November 20, 2023. The results shown were consistent for approximately the next year. Late in 2024, the search query got the 'Help is available' screen, but when typing in the query would still yield autocomplete results for the 'i want to hurt myself, this was tested again on February 27, 2025.

After testing, the ClaraAda accounts started getting recommended harmful content, in some cases I tested following accounts, for example Disney accounts, and see what that did to the Reels experiences for the test accounts. After a few weeks of usage, the test accounts started getting advertisements, and in some cases I recorded advertisements along with the content that was recommended by Instagram next to it.

On February 26, 2025, I opened the ClaraAda68 account, went through the notices for Teen Accounts, with all defaults including Sensitive Content Controls, the video shows unedited recommendations made by Instagram to a teen account on that day.

P2188.3

- ✓  1. Account creation to reels tests ● Feb 28, 2025 at 4:01 PM
 -  13 year old girl acco...ly explicit videos.MP4 Nov 29, 2023 at 10:12 AM
 -  14 year old boy to non-explicit porn.MP4 Dec 16, 2023 at 11:25 AM
 -  14 year old boy to ris...behavior 1080p.mov Feb 20, 2024 at 7:37 AM
 -  14 year old boy to ris...gerous behavior.MP4 Dec 18, 2023 at 6:32 AM
 -  Baseline_23_Year_ol..._first_reels_use.MP4 Dec 18, 2023 at 5:54 PM
- ✓  2. Minors posting about their age Feb 28, 2025 at 3:01 PM
 -  'you sound bored an...d on' to a minor.MP4 Nov 21, 2023 at 2:54 PM
 -  10 years old and sexualized videos.MP4 Nov 29, 2023 at 10:55 AM
 -  Minor recommendin...ooby Doo Video.MP4 Dec 16, 2023 at 7:40 AM
 -  minor videos with tre...lking about age.MP4 Dec 3, 2023 at 6:57 AM
 -  minors_talking_about_age1.PNG ● Feb 27, 2025 at 5:36 PM
 -  minors_talking_about_age2.PNG ● Feb 27, 2025 at 5:34 PM
 -  minors_talking_about_age3.PNG ● Feb 27, 2025 at 5:34 PM
 -  minors_talking_about_age4.PNG ● Feb 27, 2025 at 5:34 PM
 -  minors_talking_about_age5.PNG ● Feb 27, 2025 at 5:34 PM
 -  minors_talking_about_age6.PNG ● Feb 27, 2025 at 5:34 PM
 -  minors_talking_about_age7.PNG ● Sep 25, 2024 at 2:07 PM
 -  Reels and audio tren...ith little children.MP4 Dec 14, 2023 at 2:03 PM
 -  RPreplay_Final17011...about their age.MP4 Nov 27, 2023 at 5:11 PM
 -  RPreplay_Final17011...o talk about age.MP4 Nov 27, 2023 at 5:22 PM
 -  RPreplay_Final17012...about their age.MP4 Nov 29, 2023 at 9:04 AM
 -  RPreplay_Final17...d performing.MP4 ● Nov 29, 2023 at 10:55 AM
- ✓  3. Filters used only by little kids Feb 28, 2025 at 8:37 AM
 -  IMG_0062 filters...ly by little kids.PNG ● Feb 27, 2025 at 5:33 PM
 -  IMG_0063 peppa...y by little kids.PNG ● Feb 27, 2025 at 5:33 PM
 -  IMG_0064 filters use...nly by little kids.PNG Feb 27, 2025 at 5:33 PM
 -  IMG_0065 filters use...nly by little kids.PNG Feb 27, 2025 at 5:33 PM
 -  IMG_0066 filters use...nly by little kids.PNG Feb 27, 2025 at 5:33 PM

P2188.4

4. Seeking likes and follows		Feb 28, 2025 at 4:19 PM
dancing with sexualized comments.MP4		Sep 25, 2024 at 10:14 AM
minors doing things...likes and follows.MP4		Feb 27, 2025 at 5:35 PM
minors_for_followers_1.PNG	●	Sep 25, 2024 at 10:11 AM
minors_for_followers_2.PNG	●	Sep 25, 2024 at 10:17 AM
minors_for_followers_3.PNG	●	Feb 27, 2025 at 5:32 PM
minors_for_followers_4.PNG	●	Feb 27, 2025 at 5:32 PM
minors_for_followers_5.PNG	●	Feb 27, 2025 at 5:33 PM
minors_for_followers_6.PNG	●	Feb 27, 2025 at 5:34 PM
minors_for_followers_7.PNG	●	Feb 27, 2025 at 5:34 PM
minors_for_followers_8.PNG	●	Feb 27, 2025 at 5:34 PM
minors_for_followers_9.PNG	●	Feb 27, 2025 at 5:34 PM
minors_for_followers_10.PNG	●	Feb 27, 2025 at 5:34 PM
minors_for_followers_11.PNG	●	Feb 27, 2025 at 5:34 PM
minors_for_followers_12.PNG	●	Feb 27, 2025 at 5:34 PM
minors_for_followers_13.PNG	●	Feb 27, 2025 at 5:34 PM
minors_for_followers_14.PNG	●	Feb 27, 2025 at 5:34 PM
minors_for_followers_15.PNG	●	Feb 27, 2025 at 5:36 PM
minors_for_followers_16.PNG	●	Feb 27, 2025 at 5:36 PM
5. Body image content	●	Feb 28, 2025 at 4:10 PM
Body Image and Sex...ear old account.MP4		Dec 16, 2023 at 7:22 AM
body image content...to a 13 year old.MP4		Dec 16, 2023 at 7:28 AM
Body image videos b...s and Takis Pop.MOV		Dec 15, 2023 at 10:12 AM
IMG_0043 body image.PNG		Dec 15, 2023 at 4:25 PM
incentivizing likes and comments.MP4		Nov 21, 2023 at 2:46 PM
minors asking to be rated.MP4		Sep 25, 2024 at 10:20 AM
Plastic surgery video.MOV		Dec 16, 2023 at 7:45 AM
too young to use skin care.PNG	●	Sep 25, 2024 at 2:06 PM

P2188.5

- 6. Sexual content recommended to teens
 - Disney reel to graphi...xual description.MP4
 - implied masturbation.MP4
 - sexual reels for a 13 year old 1.MP4
 - sexual reels for a 13 year old 2.MP4
 - sexual reels for a 13 year old 3.MP4
 - sexual reels for a 13 year old 4.MP4
 - sexually explicit reco...13 year old girl.MP4
- 7. Self Harm
 - i_want_to_hurt_myself_1.PNG
 - i_want_to_hurt_myself_2.PNG
 - i_want_to_hurt_myself_3.PNG
 - i_want_to_hurt_myself_4.PNG
 - i_want_to_hurt_myself_5.PNG
 - i_want_to_hurt_myself_6.PNG
 - i_want_to_hurt_myself_7.PNG
- 8. Suggestive and exp...tent by or with minors
 - account exploiting m...rs 14k followers.MP4
 - cute_rose_7890.mov
 - Example - 'not my pr...ou by Pop Tarts.MOV
 - explore surface full...ploitative content.MP4
 - little girl exposing se...riate comments.mov
 - Many children that lo...te comments 2.MP4
 - Many children that lo...riate comments.MP4
 - minor comments ab...ollowers are men.MP4
 - minor videos with co...ents soliciting 2.MP4
 - minor videos with co...ents soliciting 3.MP4
 - minors brought to you by Kit Kat.MOV
 - minors dancing wi...te comments.MP4
 - minors in suggesti...t 200k views.MP4
 - Minors sexualized wi...riate comments.mov
 - you like it when i ben...y back 27k likes.mov
- 9. Revisiting account in February 2025
 - February 2025 re...iting account.MP4

